

Jeanetter Graham  
March 28, 2014

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION

JEANETTER GRAHAM, ETC. PLAINTIFF

VERSUS CAUSE NO. 2:13CV67-KS-MTP

ALEX HODGE, ET AL. DEFENDANTS

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DEPOSITION OF JEANETTER GRAHAM

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APPEARANCES NOTED HEREIN

DATE: MARCH 28, 2014  
PLACE: WYATT, TARRANT & COMBS  
4450 OLD CANTON ROAD, STE 210  
JACKSON, MISSISSIPPI  
TIME: 9:18 A.M.

REPORTED BY: TODD J. DAVIS  
CSR #1406, RPR

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Madison, Mississippi 39130  
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Page 2	<p>1 APPEARANCES:</p> <p>2</p> <p>3 EVERETT SANDERS, ESQ.</p> <p>4 Sanders Law Firm</p> <p>5 Post Office Box 565</p> <p>6 Natchez, Mississippi 39120</p> <p>7</p> <p>8 COUNSEL FOR PLAINTIFF</p> <p>9</p> <p>10 JASON DARE, ESQ.</p> <p>11 Wyatt, Tarrant &amp; Combs</p> <p>12 Post Office Box 16089</p> <p>13 Jackson, Mississippi 39236</p> <p>14</p> <p>15 COUNSEL FOR DEFENDANTS</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23 TODD J. DAVIS</p> <p>24 DAVIS COURT REPORTING</p> <p>25 Post Office Box 44</p> <p>Madison, Mississippi 39130</p> <p>(601) 856-8889</p>
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Page 4	<p>1 JEANETTER GRAHAM,</p> <p>2 having been first duly sworn, was examined and</p> <p>3 testified under oath as follows:</p> <p>4 EXAMINATION BY MR. DARE:</p> <p>5 Q. Can you please state your full name for</p> <p>6 the record, please?</p> <p>7 A. Okay. Jeanetter Ann Graham.</p> <p>8 Q. Ms. Graham, have you ever given a</p> <p>9 deposition before?</p> <p>10 A. No.</p> <p>11 Q. All right. Real easy, couple of ground</p> <p>12 rules just going through. What I'm going to do is</p> <p>13 I'm going to ask you a series of questions. It is</p> <p>14 based on what you know. That's all I need to know</p> <p>15 is what you know.</p> <p>16 If you don't --</p> <p>17 A. Okay.</p> <p>18 Q. -- understand my question, will you</p> <p>19 please feel free to ask me to rephrase it. If you</p> <p>20 answer a question, I will assume that you</p> <p>21 understood the question as asked.</p> <p>22 A. Okay.</p> <p>23 Q. We also have a court reporter trying to</p> <p>24 take down everything that both you and I say.</p> <p>25 Makes it a lot easier on him if you wait until I</p>
Page 5	<p>1 finish asking the question before you answer it.</p> <p>2 Also, he can't take down head nods or uh-huhs and</p> <p>3 uh-uhs.</p> <p>4 A. Okay.</p> <p>5 Q. So if you say uh-huh, I will ask is that</p> <p>6 a yes or is that a no, just to make sure that we</p> <p>7 have our record clear.</p> <p>8 A. Okay.</p> <p>9 Q. All right. What is your maiden name?</p> <p>10 A. Barnett. That's B-A-R-N-E-T-T.</p> <p>11 Q. Okay. Where do you currently live?</p> <p>12 A. I live at 716 South Magnolia in Laurel,</p> <p>13 Mississippi.</p> <p>14 Q. How long have you lived there?</p> <p>15 A. Goodness. About four years.</p> <p>16 Q. Who currently lives there with you? Who</p> <p>17 currently lives there with you?</p> <p>18 A. I have two grandchildren.</p> <p>19 Q. Either over the age of 18?</p> <p>20 A. Neither one. I have a three and a six.</p> <p>21 I did have my daughter living with me, but she's</p> <p>22 in college. So I'm not claiming her.</p> <p>23 Q. Okay. Where do you currently work?</p> <p>24 A. I work for Bill and Barbara Helen</p> <p>25 Mullins out of Laurel, Mississippi.</p>

2 (Pages 2 to 5)

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1 Q. What do you do there?  
 2 A. I am a personal caregiver.  
 3 Q. Okay. Do you have a professional  
 4 license? LPN? RN? CNA?  
 5 A. I have the CNA. I -- yeah.  
 6 Q. How long have you worked there?  
 7 A. I've been there about seven years.  
 8 Q. Okay. In 2009, I guess you worked for  
 9 the Mullinses as well; is that correct?  
 10 A. That's correct.  
 11 Q. What was your typical schedule? How  
 12 many days a week did you work, and when did you  
 13 start working? When did you typically finish  
 14 work?  
 15 A. Well, it kind of varied. But Monday  
 16 through Friday, I worked like from 8:00 to 4:00 or  
 17 8:00 to 5:00.  
 18 Q. That's 8:00 a.m. to 4:00 or 5:00 p.m.?  
 19 A. Right.  
 20 Q. Okay.  
 21 A. As needed on Saturday. His wife had a  
 22 CVA, so I have to get her up and stuff. And on  
 23 Sunday, I come in, and I would get her up to get  
 24 dressed for church. And that would be one to two  
 25 hours on Sundays.

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1 last name?  
 2 A. No. Because she's married. But she was  
 3 a Graham.  
 4 Q. To your knowledge, did Albert Graham  
 5 have any more children?  
 6 A. No.  
 7 Q. When were you and Albert Graham married?  
 8 A. We was married in 2008. March 1st.  
 9 Q. Was he married prior to you?  
 10 A. Yes.  
 11 Q. What was the name of his prior wife?  
 12 A. Betty.  
 13 Q. Do you know Betty's maiden name?  
 14 A. Moffett.  
 15 Q. M-O-F-F-E-T-T?  
 16 A. Yes.  
 17 Q. Do you know when they were divorced?  
 18 A. 1975.  
 19 Q. Was Albert Graham working in 2009?  
 20 A. No. He was on disability.  
 21 Q. What was his disability? What was the  
 22 disability?  
 23 A. Well, cardiac complications. He had a  
 24 heart attack. He had a CVA, which is a stroke.  
 25 Q. In 2009, were you also living at 716

Page 7

1 Q. Okay.  
 2 A. And I still do that.  
 3 Q. Okay. So you are a -- as a personal  
 4 caregiver, the Mullinses are not -- they don't  
 5 have a company in which you go out and provide  
 6 outside medical care?  
 7 A. No.  
 8 Q. This is personally for his wife? Mr.  
 9 Mullins' wife?  
 10 A. Correct.  
 11 Q. Okay. Has an estate been opened for  
 12 Albert Graham?  
 13 A. No.  
 14 Q. Okay. Can you provide me the names of  
 15 all of Albert Graham's children, whether or not  
 16 living or deceased?  
 17 A. He has a daughter Keisha. I have no  
 18 idea where she is. She had lost contact with her  
 19 dad. I did see her at the funeral.  
 20 Q. How long prior to his death did she lose  
 21 contact with her dad?  
 22 A. About two years.  
 23 Q. Okay.  
 24 A. They just had an argument and fell out.  
 25 Q. Okay. Do you know her last -- Keisha's

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1 South Magnolia in Laurel?  
 2 A. No. We was at 2469 Bush Dairy Road.  
 3 Q. Is that also in Laurel?  
 4 A. Correct.  
 5 Q. Okay. In or around November of 2009,  
 6 who all was living at 2469 Bush Dairy Road in  
 7 Laurel with you and Albert?  
 8 A. Nobody.  
 9 Q. Okay.  
 10 A. Now, at 2469, also, there was a house  
 11 there, and his mother stayed in that house; and we  
 12 both seen about her. But we stayed in an old  
 13 trailer there. Uh-huh (affirmative response).  
 14 Q. Is his mother still living?  
 15 A. She died a few months after he did.  
 16 Q. I believe I've seen that you were  
 17 actually caring for his mother in November of 2009  
 18 as well; is that correct?  
 19 A. Yes. I made sure she was clean. And  
 20 breakfast and supper.  
 21 Q. Okay. Do you have any paperwork at your  
 22 house or somewhere else that you can obtain  
 23 relating to Mr. Graham's disability?  
 24 A. Yes.  
 25 Q. In other words, I'd like to know how

3 (Pages 6 to 9)

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1 much he received a month for the disability.  
 2 Do you have that?  
 3 A. Yes.  
 4 Q. All right. As you sit here today, do  
 5 you know the exact dollar amount of how much he  
 6 received per month for disability?  
 7 A. About 1,800.  
 8 Q. Okay.  
 9 A. He also received a pension from Ingalls  
 10 Shipyard.  
 11 Q. Okay. How much was that?  
 12 A. About 1,230.  
 13 Q. How long after his death did you still  
 14 receive checks from the government for any form of  
 15 disability?  
 16 A. They canceled after then. Everything  
 17 was dropped. Even the pension. The pension, the  
 18 way it was set up, it was for his -- until he --  
 19 lifetime. As long as he lived, he would receive  
 20 it, but when he died, it canceled.  
 21 Q. Okay. All right. Other than the  
 22 incarceration that he was, I guess, serving in  
 23 November of 2009 through April of 2010, do you  
 24 know if Albert Graham had ever been to jail prior  
 25 to that time?

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1 you make copies of what you sent off?  
 2 A. Sure.  
 3 Q. All right. And do you still have those  
 4 as we sit here today?  
 5 A. Yes.  
 6 Q. I understand probably not with you,  
 7 but --  
 8 A. No -- I don't know. No. I don't  
 9 have -- I get a pension from -- from the VA.  
 10 Q. Do you still get that?  
 11 A. I do.  
 12 Q. How much of a pension do you get from  
 13 the VA? And is it paid monthly? Yearly?  
 14 A. Monthly.  
 15 Q. And how much do you get a month for  
 16 pension from the VA?  
 17 A. Twelve.  
 18 Q. 1,200?  
 19 A. That's correct.  
 20 Q. Okay.  
 21 A. That poison killed my husband, too.  
 22 Q. And to your knowledge, did Albert Graham  
 23 ever file any civil lawsuits during his lifetime?  
 24 A. None that I'm aware of.  
 25 Q. Had he ever been sued?

Page 11

1 A. In the '70s, I believe, he was in  
 2 Illinois.  
 3 Q. And Mr. Graham also fought in Vietnam;  
 4 did he not?  
 5 A. He did.  
 6 Q. I believe I've seen paperwork where  
 7 there has been a determination that his death was  
 8 caused whether in whole or in part by Agent  
 9 Orange; is that correct?  
 10 A. Complications from it.  
 11 Q. Complications from Agent Orange?  
 12 A. Uh-huh (affirmative response).  
 13 Q. Did you receive a check from the  
 14 government for his death as a result of  
 15 complications from Agent Orange?  
 16 A. I did get compensated.  
 17 Q. How much?  
 18 A. After a year. I'm trying to see. About  
 19 12,000.  
 20 Q. Okay. Did you have to file a suit to  
 21 get compensated for that?  
 22 A. No. I just had to get all my papers  
 23 together and send it to the appropriate people.  
 24 Q. Okay. Do you still have the paperwork  
 25 that you sent off to the appropriate people? Did

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1 A. Not that I know of.  
 2 Q. Okay. Do you know if he had ever filed  
 3 for bankruptcy?  
 4 A. Not that I know of.  
 5 Q. Have you ever filed for bankruptcy?  
 6 A. No, I have not.  
 7 Q. Okay. Other than his mother living in  
 8 the house at 2469, did anyone else live in that  
 9 house with his mother at 2469 Bush Dairy Road?  
 10 A. No.  
 11 Q. Did anyone else live in the trailer with  
 12 you and Albert Graham in November of 2009 at 2469  
 13 Bush Dairy Road?  
 14 A. No. I have a daughter.  
 15 Q. And is that the same daughter that's --  
 16 A. That's in college.  
 17 Q. -- in college?  
 18 A. Uh-huh (affirmative response).  
 19 Q. And is it her children that you are  
 20 keeping at your house now?  
 21 A. One of them. I actually have three  
 22 children. And I had all three of them in college  
 23 at the same time. So it's been rough.  
 24 Q. Now, were you married prior to your  
 25 marriage with Albert Graham?

4 (Pages 10 to 13)

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1 A. Yes.  
 2 Q. Okay. And when were you divorced?  
 3 A. Gosh, '92.  
 4 Q. What are the names of all of your  
 5 children that are above the age of 18?  
 6 A. Above the age of 18?  
 7 Q. Yes, ma'am.  
 8 A. Okay.  
 9 Q. Including married names and maiden  
 10 names, please.  
 11 A. Okay. Addrianna Jones,  
 12 A-D-D-R-I-A-N-N-A. Dewitt Jones. Nicole Jones.  
 13 Q. And where is Addrianna Jones living?  
 14 A. She is in Mobile now.  
 15 Q. That's in Alabama?  
 16 A. Uh-huh (affirmative response).  
 17 Q. Yes?  
 18 A. Yes.  
 19 Q. Thank you.  
 20 Where is Dewitt Jones living?  
 21 A. Los Angeles, California.  
 22 Q. And Nicole Jones?  
 23 A. Mobile, Alabama.  
 24 Q. Does Albert Graham have any brothers and  
 25 sisters living in or around the Laurel, Jones

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1 sit here today?  
 2 A. Yes.  
 3 Q. I believe it started about eight o'clock  
 4 that morning when you were going to work; is that  
 5 correct?  
 6 A. Yes.  
 7 Q. And can you tell me, as you sit here  
 8 today, what you recall occurring?  
 9 A. I personally recall him getting angry  
 10 because he wanted to use the vehicle, and I wanted  
 11 to go to work. And he wasn't himself at the time.  
 12 I could tell he was under the influence.  
 13 Words was passed, strong words. So  
 14 I got in my car, and I was driving to get away.  
 15 He said he thought I was going to run over him.  
 16 And he took out his .38 and shot through the  
 17 windshield and shot me.  
 18 Q. Where did he shoot you? You are  
 19 indicating.  
 20 A. Upper -- upper chest area.  
 21 Q. In your left upper chest area?  
 22 A. Uh-huh (affirmative response). But  
 23 it's -- the bullet is in my -- it is here.  
 24 Q. The bullet is still inside of you?  
 25 A. It is.

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1 County area?  
 2 A. No.  
 3 Q. Okay. Does Albert Graham have any  
 4 brothers or sisters living in Mississippi?  
 5 A. No.  
 6 Q. Okay.  
 7 A. I'm sorry. He has a brother in a  
 8 nursing home. I forgot about him.  
 9 Q. What is his name?  
 10 A. His name is Eudell Graham.  
 11 Q. E-U-D-E-L-L?  
 12 A. That's correct.  
 13 Q. Okay. Are both of Albert Graham's  
 14 parents deceased?  
 15 A. Yes.  
 16 Q. Okay. Other than the pension from  
 17 Ingalls Shipyard or the check for disability that  
 18 you have mentioned today, did Albert Graham have  
 19 any other source of money coming into him in or  
 20 around November of 2009?  
 21 A. No.  
 22 Q. Okay. Getting into the event that  
 23 occurred between you and Mr. Graham on or around  
 24 November the 10th of 2009.  
 25 Do you recall that incident as you

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1 Q. Okay. Mr. Graham wanted to use the  
 2 vehicle to go get more beer and cigarettes; did he  
 3 not?  
 4 A. What he wanted to use it for, I'm not  
 5 sure. But I know he wanted the vehicle, and it  
 6 just was not happening.  
 7 Q. Was he carrying the .38 on his person,  
 8 or did he have to go inside and come back out and  
 9 shoot into the vehicle?  
 10 A. He reached behind himself, and he pulled  
 11 out the gun --  
 12 Q. So --  
 13 A. -- and he shot.  
 14 Q. -- it was in his back pocket or in his  
 15 back --  
 16 A. The belt.  
 17 Q. -- belt?  
 18 A. Uh-huh (affirmative response).  
 19 Q. Okay. Had Mr. Graham ever been violent  
 20 with you before?  
 21 A. Yes.  
 22 Q. Okay. I believe he had tried to  
 23 strangle you before; is that correct?  
 24 A. Yes.  
 25 Q. Had he ever threatened to kill you

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1 before?  
 2 A. Yes.  
 3 Q. How many times did he -- had he  
 4 threatened to kill you prior to this November 2009  
 5 incident?  
 6 A. Numerous. I can't say exactly how many  
 7 times. But if he was under the influence, I --  
 8 you know, what can I say? He -- it was several  
 9 times. I can't say exactly how many times. But  
 10 that was when he was not himself.  
 11 Q. Did he drink on a daily basis?  
 12 A. No.  
 13 Q. How often during a week would you say  
 14 that he got drunk?  
 15 A. First of the month.  
 16 Q. Was that when he got his pension check  
 17 in?  
 18 A. Yes.  
 19 Q. And would he typically use all of his  
 20 pension check on beer and cigarettes?  
 21 A. Yes. Recreational things.  
 22 Q. What about the check from the VA? Would  
 23 he typically use all of that on beer, cigarettes  
 24 and --  
 25 A. He did not --

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1 Q. -- recreational things?  
 2 A. He did not receive a check from the VA.  
 3 Q. Sorry. The disability check?  
 4 A. Yes.  
 5 Q. Now, when you say recreational things,  
 6 did Mr. Graham ever use illegal narcotics?  
 7 A. Yes.  
 8 Q. What were those? What types of drugs  
 9 did he use?  
 10 A. It was crack cocaine, and I don't know  
 11 what else.  
 12 MR. SANDERS: Were these provided to us?  
 13 MR. DARE: I just got it yesterday.  
 14 MR. SANDERS: Oh, okay.  
 15 MR. DARE: That can actually be your  
 16 copy.  
 17 BY MR. DARE:  
 18 Q. What I'm going to do, Ms. Graham, I'm  
 19 going to have marked as Exhibit 1 to your  
 20 deposition the entirety of some statements  
 21 provided to the Jones County DA that I just  
 22 received yesterday. Have the fax line at the top  
 23 even.  
 24 And what I'm going to do -- the  
 25 copy that you have before you is actually a copy

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1 for your attorney. I'm going to get you to review  
 2 the one that I have marked. They're all the same,  
 3 but just so that we are certain that you're  
 4 reviewing the correct one.  
 5 (Exhibit No. 1 marked for  
 6 identification.)  
 7 BY MR. DARE:  
 8 Q. Ms. Graham, I'm going to hand you what  
 9 has been marked as Exhibit 1 to your deposition.  
 10 If you could review that for me, please, ma'am.  
 11 MR. DARE: Go off while she is reading  
 12 that.  
 13 (A short recess was taken.)  
 14 BY MR. DARE:  
 15 Q. You can hang on to that. I would like  
 16 to go over a few of the points in here.  
 17 And for the record, I am going to  
 18 flip to what appears to be a sworn statement by  
 19 you. This is on -- in Exhibit 1, this is JC-869.  
 20 Is that your signature right above  
 21 name?  
 22 A. Yes.  
 23 Q. What is the date that you signed that?  
 24 A. It has 11/12/2009.  
 25 Q. And you see that it's a sworn statement;

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1 is that correct?  
 2 A. Yes.  
 3 Q. Do you remember giving a statement in or  
 4 around 11/12/2009?  
 5 A. Yes.  
 6 Q. And is the entirety of that statement  
 7 true, accurate, and correct?  
 8 A. Yes.  
 9 Q. Okay.  
 10 A. Yes.  
 11 Q. Okay. Who is -- I'm flipping to the  
 12 next page, Page JC-870.  
 13 Who is Helen Wilson?  
 14 A. That's a distant cousin.  
 15 Q. Of yours or of Mr. Graham's?  
 16 A. Of mine. I don't even know how we're  
 17 related. I just know we always called each other  
 18 cousins.  
 19 Q. Okay. Prior to the Tuesday when  
 20 Mr. Graham shot you, did you know that he had told  
 21 Helen Wilson that he was going to kill you?  
 22 A. No.  
 23 Q. When did Helen Wilson tell you that,  
 24 that Albert Graham had told her that he was going  
 25 to kill you?

6 (Pages 18 to 21)



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1 A. This was after all of this had happened.  
 2 Q. It was after he had shot you?  
 3 A. Yes.  
 4 Q. Okay. And you noticed that her  
 5 statement is signed 11/16/2009 -- November 16th,  
 6 2009; is that right?  
 7 A. Yes.  
 8 Q. Did you read her statement back in  
 9 November of 2009?  
 10 A. No. This was my first time seeing the  
 11 statement.  
 12 Q. Seeing her statement?  
 13 A. Uh-huh (affirmative response). But I  
 14 knew this Sumrall -- I believe that was his  
 15 name -- the investigative officer was going to  
 16 talk with her.  
 17 Q. Prior to November of 2009, was Albert  
 18 Graham on any form of prescription medication?  
 19 A. Yes.  
 20 Q. Do you know where he had that  
 21 prescription medication filled?  
 22 A. Other than the samples we got from the  
 23 doctor's office, he got from Wal-Mart.  
 24 Q. Did he use any other pharmacy besides  
 25 Wal-Mart?

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1 medication out of the money that you made?  
 2 A. No.  
 3 Q. Did you have to pay rent or car note or  
 4 anything out of the money that you made?  
 5 A. The money I made?  
 6 Q. Yes, ma'am.  
 7 A. Yes.  
 8 Q. Okay. So, if I understand correctly,  
 9 you kept your money separate from the money that  
 10 he brought in for pension and disability; is that  
 11 right?  
 12 A. Well, no, I wouldn't say that, because  
 13 Albert would give me money. Albert would give me  
 14 money, and I would see about the household for his  
 15 mother, things that she needed, food and stuff,  
 16 you know. And if she needed personal items, you  
 17 know, I would see about that.  
 18 Q. So he would give you money for his mom?  
 19 A. His mom and my daughter.  
 20 Q. Okay.  
 21 A. My daughter. And he helped me buy her  
 22 car and stuff like that. He seen about us.  
 23 Q. Did he ever use your money for beer,  
 24 cigarettes, and crack cocaine?  
 25 A. Not that I'm aware of.

Page 23

1 A. No.  
 2 Q. No?  
 3 A. No.  
 4 Q. Now, would you typically go and pick up  
 5 the prescriptions at Wal-Mart or would he?  
 6 A. It would vary. Sometime he would go,  
 7 and sometimes I would go.  
 8 Q. Okay.  
 9 A. Now, before he got his disability, I --  
 10 we got samples on top of samples from the Heart  
 11 Care Center. You know, they have drug reps come  
 12 in, and if they have patients that's indigent or  
 13 something, they would -- they would give them  
 14 samples.  
 15 Q. But after he got on disability, he would  
 16 actually go to Wal-Mart and get the prescriptions?  
 17 A. Yes. They was \$4.  
 18 Q. When did he get on disability, if you  
 19 can recall?  
 20 A. He got disability 2008. He didn't have  
 21 any insurance or nothing.  
 22 Q. Going back to an earlier statement that  
 23 you made about how he would spend his pension  
 24 money and his disability money.  
 25 Would you ever have to pay for his

Page 25

1 Q. Okay. When did he buy your daughter a  
 2 car?  
 3 A. He paid down on my daughter a car. I  
 4 paid the car notes.  
 5 Q. Okay. How much did he pay down on the  
 6 car?  
 7 A. A thousand.  
 8 Q. Did he have any bank accounts in or  
 9 around 2008 or 2009?  
 10 A. I believe.  
 11 Q. Who was the bank account through?  
 12 A. Community Bank.  
 13 Q. Was this a joint account that both you  
 14 and Albert shared, or was this his own private  
 15 account?  
 16 A. It was his account. And I was like POD  
 17 on it. Because he had -- he got it before we got  
 18 married.  
 19 Q. How long had y'all dated prior to 2008  
 20 when you got married?  
 21 A. I had known him all of my adult life,  
 22 and -- 40 years.  
 23 Q. You dated for 40 years before you got  
 24 married?  
 25 A. Yes. I was 16 years old.

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1 Q. Okay.  
 2 A. All my life. My first and my last.  
 3 Q. Were y'all dating when he was married?  
 4 A. No.  
 5 Q. Okay. And you weren't dating when you  
 6 were married either?  
 7 A. No. We had -- he went his way. I went  
 8 mine. And we got back together after his divorce,  
 9 after my divorce.  
 10 Q. So it wasn't straight for 40 years, it  
 11 was off and on for 40 years, basically?  
 12 A. I've known him for 40 years of my life.  
 13 Q. Right. And maybe I used a term that I  
 14 shouldn't have. When I say dating, how long prior  
 15 to you being married were you and Albert in an  
 16 exclusive relationship where you were only seeing  
 17 each other?  
 18 A. I will say about -- when I got divorced,  
 19 we got back together. And when he got divorced,  
 20 we got together. Because I was not married at the  
 21 time. It was in-between those times.  
 22 Q. So you got a divorce in 1992?  
 23 A. Uh-huh (affirmative response).  
 24 Q. Yes, ma'am?  
 25 A. Yes.

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1 A. Yes. And that was me in 2004, that's  
 2 how it was listed. Okay.  
 3 Q. Do you see at the top it says  
 4 10/18/2010?  
 5 A. Okay.  
 6 Q. Is that your writing?  
 7 A. That is my writing.  
 8 Q. All right. So on 10/18/2010, had you  
 9 gone back to using the name Jeanetter Jones?  
 10 A. No.  
 11 Q. Okay.  
 12 A. I was making the statement because that  
 13 was my name at the time when that happened in  
 14 2004.  
 15 Q. So May 27, 2004, you were using the name  
 16 Jeanetter Jones?  
 17 A. Yes.  
 18 Q. And you didn't become Jeanetter Graham  
 19 until --  
 20 A. 2008.  
 21 Q. -- 2008? Understood. Okay. Why were  
 22 you arrested in May of 2004?  
 23 A. I had -- was -- I had bought an old car.  
 24 And the old car didn't get all of the kicks out of  
 25 it, I guess. It overheated. And when it

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1 Q. Just wanted to make sure.  
 2 So you think that maybe you started  
 3 exclusively dating Mr. Graham -- Albert Graham  
 4 after your divorce in 1992; is that right?  
 5 A. Yes.  
 6 Q. Okay. In 2010, were you still using the  
 7 name of Jeanetter Jones?  
 8 A. In 2010?  
 9 Q. Yes, ma'am.  
 10 A. I was married in 2010.  
 11 Q. Ms. Graham, what I am going to do is  
 12 have marked as Exhibit 2 to your deposition some  
 13 documents that your attorney produced to me.  
 14 A. Uh-huh (affirmative response).  
 15 Q. This is JG-6, 7 and 8.  
 16 A. Okay.  
 17 (Exhibit No. 2 was marked for  
 18 identification.)  
 19 BY MR. DARE:  
 20 Q. All right. Ms. Graham, I'm going to  
 21 hand you what has been marked as Exhibit 2 to your  
 22 deposition. Let's start on that first page.  
 23 A. Okay.  
 24 Q. You see, "To whom it may concern, I,  
 25 Jeanetter Jones"? Is that you?

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1 overheated, I parked at a friend of mine's place.  
 2 And I asked her if I could park the car there and  
 3 let it cool down because it was running hot.  
 4 And then as I parked the car, I  
 5 left the car and went and sat in the van with her.  
 6 And when I sat in the van with her and I was  
 7 telling her how good God has been to me because I  
 8 got two jobs private sitting. And -- and that  
 9 wasn't very long after my mother had passed and  
 10 all.  
 11 So I was just telling her how good  
 12 God was. And about the time I got how God is, all  
 13 hell broke loose. They -- I mean, they come up  
 14 everywhere. It was a bust -- a drug bust. And I  
 15 was in the middle of all of this. I was in the  
 16 wrong place at the wrong time.  
 17 Q. You didn't know that she had drugs in  
 18 the van?  
 19 A. No. Didn't know. She had kids in the  
 20 van.  
 21 Q. Did she?  
 22 A. Yes.  
 23 Q. Oh, wow.  
 24 A. I didn't know that.  
 25 Q. All right. So you were arrested.

8 (Pages 26 to 29)



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1 Now, who represented you in this  
2 criminal proceeding in May of 2004?  
3 A. I had no representation. Because I -- I  
4 don't know. I didn't have representation. It  
5 didn't go any further. The charges was dropped,  
6 because as they watched the film they saw exactly  
7 what I said. Like I said, I was in the wrong  
8 place at the wrong time.  
9 Q. Uh-huh (affirmative response).  
10 A. And a bad situation. But I -- by God's  
11 grace, I made it through. But like I said, I  
12 stayed in that place.  
13 Q. So you had an initial appearance, and  
14 then the charges were dropped; is that right?  
15 A. I got out on bond. And then I  
16 challenged the -- I challenged the whole thing by  
17 writing letters and everything. And the DA  
18 reviewed the -- the video. And he said he had no  
19 evidence to convict me on these charges.  
20 Q. When was your bond set?  
21 A. Six days later.  
22 Q. Okay. Now, you were arrested on May 27,  
23 2004?  
24 A. I believe. I do believe.  
25 Q. And you said you spent six days in jail?

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1 A. Yes.  
2 Q. Okay. Who arrested you?  
3 A. Oh, gosh. I don't know. I just know it  
4 was a whole bunch of people. I don't know.  
5 Q. Was it Laurel PD? Jones County  
6 Sheriff's Department?  
7 A. Well, Jones County Sheriff's Department  
8 had a narcotic section. I don't know. 84 West.  
9 And, actually, Jones County, most of these people  
10 that arrested me, they ended up getting arrested  
11 themselves because they was doing underhanded  
12 stuff.  
13 I mean, this was the narcotics  
14 squad or whatever. They ended up getting  
15 prosecuted and sent to jail and prison.  
16 Q. Okay. But as you sit here today, you  
17 don't know who arrested you or who -- I'm sorry --  
18 what entity arrested you, whether they were with  
19 the Mississippi Bureau of Narcotics or whether  
20 they were with the Laurel PD or with the Jones  
21 County Sheriff's Department?  
22 A. This was Jones County Sheriff's  
23 Department, because I was in the county jail.  
24 Q. All right. And then after six days, you  
25 believe that you bonded out; is that right?

Page 32

1 A. Yes.  
2 Q. Okay. What medication were you taking  
3 in 2004, that you claimed was not provided to you  
4 in 2004?  
5 A. Me?  
6 Q. Yes, ma'am.  
7 A. Oh, I was taking insulin, Glucophage,  
8 Lotensin. I had a purse -- just like I got a  
9 purse full right now, I had a purse full then.  
10 And my meter, my Accu-Chek machine, everything.  
11 Q. Did you know anybody at the Jones County  
12 Jail? Who did you talk with at the Jones County  
13 Jail in May of 2004 about your medication?  
14 A. Nurse Booth.  
15 Q. Okay.  
16 A. She is deceased.  
17 Q. You talked with Nurse Booth at the Jones  
18 County Jail about your medication; is that  
19 correct?  
20 A. That's correct.  
21 Q. What did Nurse Booth tell you about your  
22 medication?  
23 A. She said she will see about it.  
24 Q. Did you ever -- well, Sheriff Hodge  
25 wasn't the sheriff back in 2004, was he?

Page 33

1 A. No.  
2 Q. Other than talking with Nurse Booth  
3 about not receiving your medication in May of  
4 2004, did you talk with anybody else with Jones  
5 County or the Jones County Sheriff's Department  
6 about your medication?  
7 A. Whoever passed the cell at the time.  
8 And it could have been different officers, but I  
9 don't remember their name. But I did inquire  
10 about my medication.  
11 Q. Okay.  
12 A. But Nurse Booth, like I said, after 72  
13 hours I got my medicine.  
14 Q. Okay. So you did get your medicine  
15 after 72 hours?  
16 A. After 72 hours.  
17 Q. Okay. Understood.  
18 And that was after you spoke with  
19 Nurse Booth?  
20 A. Yes.  
21 Q. Okay. Going to the second page. Who is  
22 Jerald L. Ulmer, Sr.?  
23 A. That's -- that was an associate minister  
24 at my local church and a family friend.  
25 Q. Now, you talked with Jerald -- is it

9 (Pages 30 to 33)

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1 Pastor Ulmer?  
 2 A. Yes.  
 3 Q. All right. Have talked with Pastor  
 4 Ulmer at all about Albert Graham and any requests  
 5 for medication?  
 6 A. During that time I asked him to  
 7 personally bring it down there. And I -- and I  
 8 know Albert had asked also. But I asked him  
 9 personally to bring it. And it was within several  
 10 days. I mean, I was out there in that old raggedy  
 11 trailer trying to find the medicine. And first of  
 12 all I gave it to Terry. I do believe Terry.  
 13 And he couldn't do it. And then I asked Jerald, I  
 14 believe, in that manner.  
 15 Q. Did they bring the medication back to  
 16 you?  
 17 A. Yes.  
 18 Q. Now, as part of the notice of  
 19 deposition, I also asked that you bring any pill  
 20 bottles that you sent them up there with, either  
 21 the Ulmers or anybody else.  
 22 Did you happen to bring those  
 23 today?  
 24 A. No. I discarded those.  
 25 Q. Okay.

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1 A. I didn't even know that I was going to  
 2 go ahead on and pursue this, but I -- every time I  
 3 thought about it, I just thought about maybe this  
 4 could help somebody else get their medicine on  
 5 time. So...  
 6 Q. So you do not have those pill bottles as  
 7 we sit here today?  
 8 A. I don't have them with me, no.  
 9 Q. Okay. Now, those pill bottles, were  
 10 those prescriptions that you had picked up from  
 11 Wal-Mart?  
 12 A. Those were prescriptions.  
 13 Q. From Wal-Mart though?  
 14 A. Yes.  
 15 Q. Okay. And as you sit here today, do you  
 16 know which -- well, for starters, how many pill  
 17 bottles did you send up there with either Terry  
 18 or Jerald Ulmer?  
 19 A. That would be at least three. That was  
 20 the Coumadin, the Coreg, and the aspirin. I had  
 21 it, but it wasn't many left in there to -- say at  
 22 least it was three.  
 23 Q. Okay.  
 24 A. Now --  
 25 Q. Go ahead.

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1 A. I'm sorry.  
 2 Q. No. It's okay.  
 3 A. Those pill bottles, I would take the --  
 4 the samples and open the samples up, which it  
 5 wasn't no more than like four or five in a sample  
 6 bottle, and put them in a pill bottle.  
 7 Q. Remember I asked before whether or not  
 8 you still received samples after Mr. Graham got on  
 9 disability?  
 10 A. Yes.  
 11 Q. And remember you said that he didn't get  
 12 samples anymore once he got on disability, that he  
 13 was able to get the medication from Wal-Mart; is that  
 14 right?  
 15 A. I didn't think I said he didn't receive  
 16 them.  
 17 Q. Okay. Let's -- and I want to be sure on  
 18 this.  
 19 A. Okay.  
 20 Q. Did he get any samples after he got on  
 21 disability?  
 22 A. Yes.  
 23 Q. From --  
 24 A. He did.  
 25 Q. -- who?

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1 A. He got them from the Heart Care Center.  
 2 We had a nurse practitioner there named Parker, I  
 3 believe, last name. And also there was a Joyce  
 4 White that worked there. And she would check the  
 5 chart sometime.  
 6 And if I would tell her that he's  
 7 low in his medicine and stuff, she would go and  
 8 ask, you know, if we could get some medicine, and  
 9 we'd get some more samples.  
 10 Q. And what heart clinic is this? Do you  
 11 know the name?  
 12 A. It is Hattiesburg Heart Center, but it  
 13 is at Heart Care Center in Laurel.  
 14 Q. Do you know Nurse Practitioner Parker's  
 15 first name?  
 16 A. Not right offhand.  
 17 Q. Okay. As you sit here today, do you  
 18 know whether or not Albert Graham took Coumadin,  
 19 Coreg, and Aspirin on a daily basis?  
 20 A. He did take it. But if he was drinking,  
 21 he didn't take that medicine. Because we didn't  
 22 want something to kind of react to another, you  
 23 know.  
 24 Q. And you said that he would drink for the  
 25 first part of the month after he got his

10 (Pages 34 to 37)

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1 disability and pension checks; is that right?  
2 A. I did.  
3 Q. And so he would typically go the first  
4 half of a month without taking any medication, and  
5 then he would take his medication the second half  
6 of the month; is that correct?  
7 A. No. I would say the first week. The  
8 first half, no, but the first week. And I  
9 wouldn't even give it a week. Maybe the first few  
10 days. It didn't last long.  
11 Q. In November -- Mr. Graham shot you on  
12 November the 10th of 2009; is that right?  
13 A. That sound correct.  
14 Q. So that's getting into the second week;  
15 is it not?  
16 A. Yes.  
17 Q. So at least in November, Mr. Graham was  
18 still drinking into the second week; is that  
19 right?  
20 A. Yes.  
21 Q. Okay.  
22 A. More drinks -- more people that he hung  
23 around with they like to drink, too, so he always  
24 had somebody to drink with.  
25 Q. Okay. Did you ever personally bring any

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1 medication up to the Jones County Jail for  
2 Mr. Graham?  
3 A. No.  
4 Q. So any information about what was said  
5 up at the jail or who brought medication up to the  
6 jail or anything at the jail, that would come from  
7 either Jerald or Terryl Ulmer; is that correct?  
8 A. Yes.  
9 Q. Okay. You have no personal firsthand  
10 knowledge of anything that was said at the jail  
11 with regards to Albert Graham's medication; is  
12 that correct?  
13 A. That's correct.  
14 Q. Okay. Did you go to any office visits  
15 at the Hattiesburg Heart Center or anywhere else  
16 with Mr. Graham in 2008 and 2009?  
17 A. Yes.  
18 Q. Were you ever told why he was taking  
19 Coumadin?  
20 A. To thin his blood.  
21 Q. Do know why he was taking -- or were you  
22 told why he was taking the Coreg?  
23 A. For his heart.  
24 Q. Okay. Did they tell you what the Coreg  
25 did for his heart?

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1 A. No.  
2 Q. Okay. Was he -- I'm sorry. Go ahead.  
3 A. That was the cardiac doctor that  
4 requested the Coreg.  
5 Q. Was he on any form of blood pressure  
6 medication?  
7 A. Yes. I believe that was Benazepril or  
8 something like that.  
9 Q. Okay.  
10 A. It was -- yeah, Benazepril.  
11 Q. When is the last time that you can  
12 recall having anything filled at the Wal-Mart  
13 pharmacy for Mr. Graham?  
14 A. It was 2009.  
15 Q. Ms. Graham, I'm going to have marked  
16 here as Exhibit 3 to your deposition the Wal-Mart  
17 pharmacy records for Albert Graham.  
18 (Exhibit No. 3 marked for  
19 identification.)  
20 BY MR. DARE:  
21 Q. All right. I'm going to hand you  
22 Exhibit 3. I want to ask you a few questions  
23 about these.  
24 A. Okay.  
25 Q. Please just let me know whenever you've

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1 had a chance to finish reviewing over that.  
2 A. Yes.  
3 Q. Okay. You ready?  
4 A. I'm ready. May I say something?  
5 Q. Yes, ma'am.  
6 A. The -- the Benazepril must have been my  
7 medicine I was thinking about, because I take it.  
8 I have blood pressure medicine, too. But I know  
9 he was given high blood pressure medicine, but I  
10 don't know which one it was.  
11 Okay. I was just correcting that  
12 statement. Okay. I'm ready.  
13 Q. Thank you.  
14 Do you see Coumadin anywhere on  
15 this list of medications?  
16 A. The warfarin and Coumadin, I do believe,  
17 is the same thing.  
18 Q. All right. So his blood thinner on here  
19 is listed as warfarin?  
20 A. Uh-huh (affirmative response).  
21 Q. And you believe that's the same thing as  
22 Coumadin.  
23 Do you see the fill date on there?  
24 And this is on page JC-867.  
25 A. Okay.

11 (Pages 38 to 41)

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1 Q. There is a fill date of February 8th,  
2 2008. Do you see that?  
3 A. Uh-huh (affirmative response).  
4 Q. There is also a fill date of January  
5 12th of 2009.  
6 Do you see that?  
7 A. Yes.  
8 Q. And under each the quantity is 30; is  
9 that right?  
10 A. I see that.  
11 Q. And under S-I-G under both of them it  
12 says take one and a half tablets by mouth every  
13 day; is that right?  
14 A. Yes.  
15 Q. Okay. So if the quantity is 30, he  
16 would have run out of his warfarin, if he took it  
17 as directed, in less than a month, would he not  
18 have, if he is taking one and a half tablets by  
19 mouth every day?  
20 A. Yes.  
21 Q. And so he would have run out of his  
22 Warfarin in or around February of 2009; is that  
23 right?  
24 A. Yes.  
25 Q. Okay. Now, going to the Coreg,

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1 Q. I understand.  
2 However, as far as prescription  
3 aspirin, it is only listed that you picked it up  
4 once; is that correct?  
5 A. I didn't know you can get prescription  
6 aspirin. The 81 milligrams, you buy those over  
7 the counter, because that's what I take, 81  
8 milligrams. Okay.  
9 Q. And I'm certainly not a doctor and --  
10 A. Uh-huh (affirmative response.)  
11 Q. -- don't know what aspirin has to be  
12 prescribed and what aspirin you can get over the  
13 counter.  
14 A. Okay.  
15 Q. I do know that on JC-867, it does say  
16 that you picked up aspirin on 10/24/2008.  
17 Do you see that?  
18 A. Uh-huh (affirmative response).  
19 Q. Yes, ma'am?  
20 A. Yes.  
21 Q. And you see that the quantity under  
22 aspirin is 30, and that he was required to take  
23 one by mouth every day.  
24 Do you see that?  
25 A. Yes.

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1 C-O-U-R-E-G.  
2 You see that anywhere on here?  
3 A. No. But it must be another name for it.  
4 I don't know. It must be a generic name for it on  
5 here. But like I said, we got samples -- bags of  
6 samples. And I got that for quite sometime.  
7 Q. Do you have any samples still at home,  
8 or did you throw all those away as well?  
9 A. No. As you -- as I was opening the  
10 samples, I put them in the bottles. And, yes, I  
11 discarded it.  
12 Q. So you don't have any samples even left  
13 as of today's date?  
14 A. No.  
15 Q. Okay.  
16 A. Four years.  
17 Q. Now, aspirin -- you said that he was  
18 taking aspirin as well.  
19 A. Uh-huh (affirmative response).  
20 Q. Aspirin is only listed here once.  
21 Do you see that?  
22 A. Uh-huh (affirmative response).  
23 Q. Yes, ma'am?  
24 A. Yes. But you could buy aspirin over the  
25 counter, 81 milligrams. OTC.

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1 Q. Okay. So that he would have run out of  
2 the prescription aspirin at least by November of  
3 2008, if he was taking that as directed, would he  
4 not have?  
5 A. He didn't run out, because I got him  
6 over the counter aspirin at 81 milligram. It was  
7 the same. I think the only difference in this one  
8 it has a coating on it to protect the stomach.  
9 That's what I think. But he always took his  
10 aspirin, because I kept him with 81 milligram  
11 aspirin.  
12 Q. Were you putting the aspirin that you  
13 purchased into the prescription bottle that you  
14 had filled on 10/24/2008?  
15 A. No. Aspirin is taken right out of the  
16 bottle.  
17 Q. Can you tell me all -- the names of all  
18 the samples that you were provided, the sample  
19 medication?  
20 A. Well, it was Coumadin. It was written  
21 out Coumadin on the bottle. It was the Coreg. It  
22 was some dig medicine. It was -- I mean, just off  
23 the top of my head.  
24 And the question was? Repeat it  
25 again.

12 (Pages 42 to 45)

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1 Q. I need know the name of all of the  
2 samples that you were provided.  
3 A. At this time, that's all I can think of.  
4 Q. Okay. So you think Coumadin, Coreg --  
5 would Digoxin sound right?  
6 A. Yes. D-I-G --  
7 Q. -- O-X-Y-N, I believe.  
8 A. I'm not sure.  
9 Q. I think it's -- I know it's a Y-N.  
10 Yeah. That sounds right. We'll go with that.  
11 A. Okay.  
12 Q. Who is Bobby Graham?  
13 A. That is his brother.  
14 Q. And is Bobby Graham still living?  
15 A. He is. I believe he's in Tennessee. He  
16 drives trucks.  
17 Q. Did you know that Bobby Graham went to  
18 visit his brother, Albert Graham, on or around  
19 November the 19th of 2009?  
20 A. He said he did.  
21 Q. Did Bobby Graham attempt to bring any  
22 medication to Albert Graham that you know of?  
23 A. Not that I know of.  
24 Q. Who is Bryant Matthews?  
25 A. That's a drinking buddy.

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1 Q. Did you know that Bryant Matthews went  
2 and visited Albert Graham on November 19th, 2009?  
3 A. I know he probably did several visits.  
4 Q. Do you know if Bryant Matthews attempted  
5 to bring any medication to Albert Graham?  
6 A. Not that I'm aware of.  
7 Q. Okay. And his attorney was Michael  
8 Mitchell.  
9 Did you ever meet with his  
10 attorney -- with Albert Graham's attorney, Michael  
11 Mitchell, at any point in time?  
12 A. No. He stated to me that he was not  
13 going to use him. That was his statement to me.  
14 Q. Okay.  
15 A. That's my phone. It's yours? Okay.  
16 I'm sorry.  
17 Q. Do you know when you gave medication to  
18 Jerald Ulmer to bring up to the jail?  
19 A. It had to be within -- I went looking  
20 for it the next day. So it had to be within the  
21 next 24 hours after the whole incident. I'll say  
22 within -- within two days at least.  
23 Q. How long were you in jail -- excuse me.  
24 How long were you in the hospital  
25 after he shot you?

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1 A. Just -- I got out that day.  
2 Q. You got out the same day?  
3 A. Got out the same day.  
4 Q. You got out the same day, and then you  
5 went back to the trailer; and you immediately put  
6 together medication to bring to Albert?  
7 A. I got out the same day. I went home.  
8 And then the next day I went and got the medicine.  
9 Q. Okay. Did you ever speak with Albert  
10 Graham while he was incarcerated at the Jones  
11 County Jail in or around November of 2009 till  
12 April of 2010?  
13 A. It was after the first of the year that  
14 I visited my husband. We would write letters.  
15 And then I wanted to visit him against my  
16 investigator's advice, because that's my husband.  
17 I wanted to see how he was doing, how he was  
18 looking, what he needed.  
19 I put money on his books. I talked  
20 with him. I prayed with him. And I said, "You  
21 sound like you're drowning." I said, "You sound  
22 like you bubbly, you know." He said, "Well, I get  
23 on the floor and do -- I can't walk like I want to  
24 walk."  
25 I said, "Well, you sound" -- he

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1 said, "They won't get me no -- no attention. They  
2 won't get me no medicine. They won't even take me  
3 to the doctor."  
4 And I said, "Well, I -- I'll see  
5 about that. I'll see about that. See about  
6 that." I said, "They don't know that you're a  
7 heart person evidently."  
8 He said, "I told them. I done  
9 asked them several times to get some -- get some  
10 medicine or go to see somebody." And I said,  
11 "Well, it's a Christian lady here. Her name is  
12 Ms. Walls. I'll talk with her" --  
13 Q. Stacey Walls?  
14 A. -- "to see about you getting some  
15 treatment."  
16 And I eventually talked with her.  
17 And I believe that was the latter part of January.  
18 And Stacey said, "I talked to the nurse. And the  
19 nurse will see about what she can do about getting  
20 his medicine or his records from the Heart Care  
21 Center so they can see exactly what he's on."  
22 And then it was going to be like  
23 right before Valentine's Day. And he said, "I  
24 still hadn't heard anything." He said, "They said  
25 they going to get my records."

13 (Pages 46 to 49)



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1 And, anyway, he said, "I signed the  
2 form, and it has been over a week; and I hadn't  
3 heard anything." And then I talked to Stacey  
4 again. Stacey said, "We're going to get right on  
5 it, because they supposed to have faxed that  
6 information over here."

7 And, anyway, I do believe they  
8 wouldn't even seen about it then unless I talked  
9 to Stacey. So she went out of her way to talk  
10 with the nurse. The nurse took a minute, but we  
11 got that faxed information from the Heart Care  
12 Center to see what he was on.

13 And then they sent him to a --  
14 eventually sent him down to a -- the clinic in  
15 Ellisville to see Donnie Scoggin, which is a nurse  
16 practitioner, also.

17 Q. Uh-huh (affirmative response). Let's  
18 take a step back.

19 When was the first time that you  
20 went up to the Jones County Jail to visit Albert  
21 Graham? What date?

22 A. The exact date? I don't know an exact  
23 date, but I believe it was in January.

24 Q. Did you talk with Stacey Walls in  
25 January of 2010?

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1 A. I do believe it was the last week of  
2 January.

3 Q. How many times did you go up to the jail  
4 from the moment Albert Graham was arrested and  
5 placed in jail until the moment he died? Was it  
6 just that once in January?

7 A. No. It was January, and it was  
8 February; and it was March.

9 Q. Did you speak with Albert Graham each  
10 time that you went up there?

11 A. I did.

12 Q. So you -- did you go multiple times in  
13 January, February, and March or just once in  
14 January and February and March?

15 A. I believe it was several, because you  
16 couldn't go but once a week. And I'm not sure if  
17 the visiting day was Saturday or Sunday. But it  
18 was at least twice a month I went. At least.

19 Q. Okay.

20 A. Because I work. I go to church. I got  
21 children and grandchildren. I did what I could.

22 Q. You are aware that Mr. Graham was taken  
23 to a clinic and was placed on medication in March  
24 of 2010; is that correct?

25 A. Yes.

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1 Q. Do you need to take a break?

2 A. No. I'm good.

3 Q. Now, I've got or your attorney has  
4 produced to me some letters -- one from Albert  
5 Graham to you and one from you to Albert Graham.

6 Do you have any other letters  
7 either from you to him or from him to you?

8 A. I could have some.

9 Q. As you sit here today, do you know of  
10 any?

11 A. I could have some old letters. I have  
12 to pull them out. I call myself trying to save  
13 them.

14 MR. DARE: You can go off the record.  
15 (A short recess was taken.)

16 BY MR. DARE:

17 Q. I'm going to have marked as Exhibit 4 to  
18 your deposition a letter dated 3/13/2010.

19 (Exhibit No. 4 marked for  
20 identification.)

21 BY MR. DARE:

22 Q. Okay. I'm going to hand you what has  
23 been marked as Exhibit 4. Can you identify that  
24 for me, please?

25 A. Yes. Just a minute.

Page 53

1 Q. All right. You notice on the first page  
2 there's a fax line from Office Depot dated  
3 7/1/2013 --

4 A. Uh-huh (affirmative response).

5 Q. -- 15:59.

6 Who faxed this document from Office  
7 Depot?

8 A. I'm sure I did.

9 Q. And you see how it says that it is Page  
10 4 of 4, right?

11 A. Okay.

12 Q. Do you know who you were faxing it to?

13 A. It's a copy of a letter.

14 Q. Do you know who you were faxing this  
15 page to?

16 A. I'm sure I was faxing a copy of it to my  
17 attorney.

18 Q. All right. And you notice that the  
19 first page says that it is Page 4 of 4, right?

20 A. Okay.

21 Q. If you flip to the second page, JG-26,  
22 look at the top, and it says William Mullins. And  
23 then it says Page 1.

24 See that?

25 A. Yes.

14 (Pages 50 to 53)



Jeanetter Graham  
March 28, 2014

Page 54	<p>1 Q. Who is William Mullins?</p> <p>2 A. That is where I work. That is his fax.</p> <p>3 Q. Do you have the original of this letter?</p> <p>4 A. I'm -- I'm sure I can probably dig it</p> <p>5 out.</p> <p>6 Q. Well, and I -- to the extent that I</p> <p>7 haven't, I believe I have asked in discovery for</p> <p>8 copies of any and all similar letters. If I</p> <p>9 haven't, I'm going to. If you can hold on to all</p> <p>10 of the letters that you have either to Albert</p> <p>11 Graham or from Albert Graham, I'm going to ask for</p> <p>12 a copy of all of them.</p> <p>13 A. Okay.</p> <p>14 Q. Now, who is Victor?</p> <p>15 A. That is his nephew.</p> <p>16 Q. You see on the P.S., it says, "If Victor</p> <p>17 has deposited a check" -- what does that say? "I</p> <p>18 won't be" --</p> <p>19 A. "I won't be mad. I just want to know."</p> <p>20 Q. Okay. What check is -- are you talking</p> <p>21 about there?</p> <p>22 A. Whatever one came. I started getting</p> <p>23 them, and I deposit them when I -- but I had to</p> <p>24 change the address to a P.O. Box.</p> <p>25 Q. So who is Bobby Ray?</p>	Page 56	<p>1 A. That's my uncle. That's my uncle and</p> <p>2 his brother-in-law.</p> <p>3 Q. That explain -- it's Albert's</p> <p>4 brother-in-law? Okay. Explain that one.</p> <p>5 A. Okay. Albert's sister married my uncle.</p> <p>6 Q. Was that before or after y'all were</p> <p>7 married?</p> <p>8 A. Decades before.</p> <p>9 Q. Okay.</p> <p>10 A. Albert's other sister married my brother</p> <p>11 decades before.</p> <p>12 Q. Got you.</p> <p>13 I take it Uncle Thomas didn't like</p> <p>14 Albert too much?</p> <p>15 A. Well, he hurt me. He hurt me. And</p> <p>16 that's one thing about you don't hurt women.</p> <p>17 Q. On this letter, first paragraph, it says</p> <p>18 that you asked Captain Stacey to pay close</p> <p>19 attention to -- to you, which I suppose is Albert?</p> <p>20 A. Uh-huh (affirmative response).</p> <p>21 Q. And get that nurse to check you.</p> <p>22 Did you ever personally speak with</p> <p>23 the nurse?</p> <p>24 A. Yes. Stacey let me talk with her.</p> <p>25 Q. Was that before or after this 3/13/2010</p>
Page 55	<p>1 A. Oh, that's his brother. He's a little</p> <p>2 wild.</p> <p>3 Q. Is that the one that's the --</p> <p>4 A. Truck driver.</p> <p>5 Q. The truck driver. Okay.</p> <p>6 So you think -- you didn't know if</p> <p>7 Bobby Ray had gotten the -- his pension check or</p> <p>8 not. Is that what you were concerned about in the</p> <p>9 P.S.?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And on Page 1 and actually</p> <p>12 through Page 2, you are talking about being able</p> <p>13 to get ahold of his pension check.</p> <p>14 Do you know if in or around March</p> <p>15 13, 2010, if you were actually receiving the</p> <p>16 pension check or if somebody else was getting it?</p> <p>17 A. It came to that address.</p> <p>18 Q. To what address?</p> <p>19 A. 2469 Bush Dairy Road.</p> <p>20 Q. And by the tone of this letter,</p> <p>21 evidently somebody else had picked up the check,</p> <p>22 and you didn't get it in or around, I'm guessing,</p> <p>23 March of 2010; is that right?</p> <p>24 A. That's correct.</p> <p>25 Q. Okay. Who's Uncle Thomas?</p>	Page 57	<p>1 letter?</p> <p>2 A. I believe it was after.</p> <p>3 Q. Did this letter reflect the first time</p> <p>4 that you had spoken with Stacey Walls?</p> <p>5 A. I spoke to Stacey prior to this letter.</p> <p>6 Q. Correct.</p> <p>7 How many times prior to this letter</p> <p>8 had you spoken with Captain Stacey Walls?</p> <p>9 A. I believe it was the end of January I</p> <p>10 spoke with -- spoke with her.</p> <p>11 Q. Okay. Other than Stacey Walls, did you</p> <p>12 speak with anybody else with the Jones County</p> <p>13 Sheriff's Department?</p> <p>14 A. It was between Stacey and the nurse.</p> <p>15 Q. Did you ever speak with Sheriff Hodge?</p> <p>16 A. I did not. Sheriff Hodge is on one end</p> <p>17 of the town, and the jail was on another -- way on</p> <p>18 another.</p> <p>19 Q. Did you ever send Sheriff Hodge any</p> <p>20 letters?</p> <p>21 A. No.</p> <p>22 Q. When you went to the jail, did they ask</p> <p>23 you to sign in?</p> <p>24 A. Yes. Everybody had to sign in. That</p> <p>25 was one of the procedures.</p>

15 (Pages 54 to 57)

Jeanetter Graham

March 28, 2014

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1 Q. Uh-huh (affirmative response). Excuse  
2 me if I have already asked this.

3 How many times do you think you  
4 spoke with Stacey Walls prior to your 3/13/2010  
5 letter?

6 A. At least twice. I talked to her and  
7 told her about, you know, his problem. And then  
8 she said, "Well, I talked to the nurse, and I will  
9 get you to talk to the nurse and -- and get the  
10 information you need."

11 And then -- then when we didn't --  
12 then when I didn't hear anything, I called again  
13 and talked to her. So at least twice.

14 Q. Okay. So the second time you talked to  
15 her it was on the phone?

16 A. Uh-huh (affirmative response).

17 Q. Yes?

18 A. Yes.

19 Q. Thank you.

20 A. Because I didn't understand why it took  
21 a minute to get a fax when I -- it just takes  
22 minutes to get a fax. And it took about a week or  
23 so to get the information. Maybe two. I don't  
24 know. I'm not sure on that one.

25 Q. Now, in your letter, you make reference

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1 to the fact that you were personally going to get  
2 the records from the heart center; is that right?

3 A. Yes.

4 Q. Okay.

5 A. I had called when they said that they  
6 didn't get it or hadn't received it. You know,  
7 they -- they put the blame on the Heart Care  
8 Center, and the Heart Care Center said I faxed it.  
9 And -- and, anyway, that was it basically.

10 MR. DARE: Tell you what, give me just a  
11 little bit of time. I'm going to review over  
12 a few things, and I may be done.

13 (A short recess was taken.)

14 MR. DARE: Go back on.

15 BY MR. DARE:

16 Q. All right. Before the deposition, I  
17 informed your counsel that I was going to ask you  
18 one legal question. And he may have to help out  
19 with this. But I want to make sure that you have  
20 not filed any state law claims in your complaints.

21 And I'll ask today: In your suit  
22 against Jones County and Sheriff Alex Hodge, have  
23 you filed any state law claims?

24 A. Not that I'm aware of.

25 Q. All right.

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1 MR. DARE: Mr. Sanders, I would  
2 respectfully ask and, if you could, can you  
3 confirm that the plaintiff has not filed any  
4 state law claims?

5 MR. SANDERS: Not that -- we have not  
6 filed any at this time that I'm aware of.

7 MR. DARE: Thank you, sir.

8 MR. SANDERS: Unless there's something  
9 in the pleadings I missed.

10 BY MR. DARE:

11 Q. In going through prediscovery  
12 disclosures, I'm not sure I have seen a list of  
13 witnesses.

14 Do you know anybody else not with  
15 Jones County, but either friends, family members,  
16 or other church members who went up to the Jones  
17 County Jail to visit with Albert Graham other than  
18 the ones that we have discussed here today?

19 A. There is an associate minister named  
20 Travis -- Eddie Travis. I know he went. And that  
21 was his ex-wife's husband. So Eddie Travis.

22 Q. What did Eddie Travis go up there for?

23 A. He's a friend. A friend.

24 Q. Did you speak with Eddie Travis after he  
25 went up there to visit with Albert Graham?

Page 61

1 A. I have talked with Eddie. He was going  
2 to the same church I was going to at that time.

3 Q. What church were you going to at that  
4 time?

5 A. West Pleasant Grove Baptist Church.

6 Q. Did Albert Graham go with you to church?

7 A. Sometimes.

8 Q. Okay. What do you recall Eddie Travis  
9 telling you about his visit with Albert Graham?

10 A. He said he sound bubbly inside.

11 Q. Anything else that you can recall?

12 A. That he was truly sorry about what he  
13 had done. He was -- he said he was concerned  
14 about me.

15 Q. Do you know when Eddie Travis went up  
16 there to visit with Albert Graham?

17 A. I think Eddie went several times. The  
18 exact month and dates and stuff I cannot say for  
19 sure.

20 Q. Is there anything that you can recall as  
21 you sit here today about what either Terryl or  
22 Jerald Ulmer said about their visits with Albert  
23 Graham?

24 A. Well, Jerald had stated that he was real  
25 quiet and withdrawn the first time. And then he

16 (Pages 58 to 61)

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1 said the second time that he was -- he wanted --  
2 he needed his -- well, that must have been the  
3 first time, too, he said about his medicine. And  
4 that he walked a lot. And, you know, he hadn't  
5 got out on the yard to walk or anything. That  
6 walking would help him out. And that he was  
7 concerned about me, and he was concerned about his  
8 mom.

9 And he was concerned about, you  
10 know, his medicine. Because, you know, when  
11 you -- he knew if he got built up with fluid, he  
12 needed a fluid pill, you know, to get some of that  
13 out from out of his chest. When he become bubbly,  
14 I always told him, "If you feel like that, you  
15 know you need to get some of that off of you, you  
16 know."

17 Q. Other than Dr. -- is it Mouannes?

18 A. Mouannes.

19 Q. Mouannes, M-O-U-A-N-N-E-S?

20 A. Uh-huh (affirmative response).

21 Q. Other than Dr. Mouannes, are all of  
22 Albert Graham's healthcare practitioners that he  
23 saw between say 2009 listed on these Wal-Mart  
24 pharmacy records?

25 A. I don't know. I don't know. He saw

Page 64

1 Q. When did Ms. Knight die?

2 A. It was this year. Couple of months ago.

3 Q. Okay. Who is Curtis Ulmer?

4 A. Curtis Ulmer?

5 Q. Yes, ma'am.

6 A. I think that was one of her employees  
7 that kept her stock fed. One of her workers.

8 Q. One of Janice Knight's workers?

9 A. Uh-huh (affirmative response). He  
10 worked -- he worked for her like feeding the hogs  
11 and the cows and stuff like that.

12 Q. Okay. Any relation to Jerald or Terry  
13 Ulmer?

14 A. Not that I'm aware of.

15 Q. Who is Abe Jones, Jr.?

16 A. He has a nickname. We call him G.G. He  
17 is a family friend.

18 Q. Okay. No relation to your former  
19 husband?

20 A. Not that I'm aware of. No.

21 Q. Okay. Who is Lou Ulmer?

22 A. Lou Ulmer? She is a childhood friend of  
23 mine. Her -- her son was incarcerated, and they  
24 let him out because he had seizures real bad. He  
25 never did get his medicine either.

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1 several doctors, you know, when we was back and  
2 forth to the emergency room and stuff. He saw --  
3 it's like Kimberly Dodd -- Dr. Kimberly Dodd.  
4 She's a pulmonary doctor. And I think that  
5 initial visit with the ER doctor was a Dr. David  
6 Sullivan. But Kimberly Dodd had found a spot on  
7 his lung.

8 Q. Was that cancer?

9 A. I -- I don't know. Because we did not  
10 pursue it. He just --

11 Q. When did she find that?

12 A. I think it was 2007 or 2008. That's --  
13 that's during the time of the CVA. And I think  
14 the CVA came before the heart attack. The stroke  
15 come before the heart attack. It was all right  
16 behind each other.

17 Q. Okay. Other than the one time in 2004,  
18 have you ever been incarcerated in the Jones  
19 County Jail?

20 A. No.

21 Q. Thank you.

22 Who is Janice Knight?

23 A. She is a deceased friend. And that's  
24 who I was sitting with when I got -- when all of  
25 this happened to me in 2004.

Page 65

1 Q. Okay. Did you ask Lou Ulmer to write a  
2 letter to -- for you?

3 A. I could have. I can't remember back  
4 then. I could have. I don't know if she did or  
5 not. I don't recall.

6 Q. Okay. Did you ask Abe Jones, Jr., to  
7 write a letter for you?

8 A. Between -- I believe that was Abe or his  
9 momma. And his momma is deceased, which is  
10 Hill -- Hilma Jones. Uh-huh (affirmative  
11 response). Because he almost died in jail without  
12 getting his medicine.

13 Now, I don't know if that was under  
14 the same sheriff or not. But I know he was there,  
15 and he didn't get his medicine.

16 Q. Okay. Did you ask Curtis Ulmer to write  
17 a letter for you?

18 A. I did.

19 Q. And did you ask Janice Knight to write a  
20 letter for you?

21 A. I did.

22 Q. Did you help any of -- whether it is  
23 Janice Knight, Curtis Ulmer, Abe Jones, or Lou  
24 Ulmer, did you help any of them write the letter?

25 A. No.

17 (Pages 62 to 65)

Jeanetter Graham

March 28, 2014

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1 Q. Were you sitting there with them as they  
 2 were writing the letter?  
 3 A. No.  
 4 Q. How did you go about asking them to  
 5 write a letter for you?  
 6 A. Telephone.  
 7 Q. And what did they do, just deliver it to  
 8 you?  
 9 A. No. I think I went by and picked it up.  
 10 Q. Did they all have their letters  
 11 together, or did you just drive around to each of  
 12 their houses?  
 13 A. Separately.  
 14 Q. Between 2008 and 2009 until 2010, had  
 15 you ever filed for divorce from Albert Graham?  
 16 A. No.  
 17 MR. DARE: Ms. Graham, thank you for  
 18 your time here today. I have no further  
 19 questions for you.  
 20 THE WITNESS: Okay. Thank you.  
 21 MR. SANDERS: We are off the record.  
 22 (Ended at 11:08 a.m.)  
 23  
 24  
 25

1 IN THE UNITED STATES DISTRICT COURT  
 2 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
 3 EASTERN DIVISION  
 4 JEANETTER GRAHAM, ETC. PLAINTIFF  
 5 VERSUS CAUSE NO. 2:13CV67-KS-MTP  
 6 ALEX HODGE, ET AL. DEFENDANTS  
 7 Original: Jason Dare, Esq.  
 8 CERTIFICATE OF DEPONENT  
 9 I, JEANETTER GRAHAM, certify that I have  
 10 examined the foregoing pages as to the correctness  
 11 thereof, and that after reading said pages, I find  
 12 them to contain a full and true transcript of the  
 13 testimony as given by me on MARCH 28, 2014, except  
 14 for the list of corrections, if any, attached on a  
 15 separate sheet with the page number, line number  
 16 and the desired correction/change. Witness my  
 17 hand, this the \_\_\_\_\_ day of \_\_\_\_\_, 2014.  
 18  
 19 JEANETTER GRAHAM  
 20 CERTIFICATE  
 21 Subscribed and sworn to before me, this  
 22 the \_\_\_\_ day of \_\_\_\_\_, 2014.  
 23  
 24 My Commission Expires: \_\_\_\_\_  
 25 \_\_\_\_\_ Notary Public

Page 67

1 CERTIFICATE OF COURT REPORTER  
 2 I, Todd J. Davis, Court Reporter and  
 3 Notary Public in and for the County of Madison,  
 4 State of Mississippi, hereby certify that the  
 5 foregoing pages contain a true and correct  
 6 transcript of the testimony of JEANETTER GRAHAM,  
 7 as taken by me in the aforementioned matter at the  
 8 time and place heretofore stated, as taken by  
 9 stenotype and later reduced to typewritten form  
 10 under my supervision to the best of my skill and  
 11 ability by means of computer-aided transcription.  
 12 I further certify that under the  
 13 authority vested in me by the State of Mississippi  
 14 that the witness was placed under oath by me to  
 15 truthfully answer all questions in this matter.  
 16 I further certify that I am not in the  
 17 employ of or related to any counsel or party in  
 18 this matter and have no interest, monetary or  
 19 otherwise, in the final outcome of this matter.  
 20 Witness my signature and seal this the  
 21 3RD day of APRIL, 2014.  
 22  
 23 \_\_\_\_\_  
 24 TODD J. DAVIS, CSR #1406  
 25 My Commission Expires:  
 March 27, 2017

18 (Pages 66 to 68)



DENNIS L. BISNETTE  
ASSISTANT DISTRICT ATTORNEY

J. RONALD FARRISH  
ASSISTANT DISTRICT ATTORNEY

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Eighteenth Circuit Court District

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FAX (601) 428-3191

## FAX COVER SHEET

TO: Jean Coppenbarger

ATTN: \_\_\_\_\_

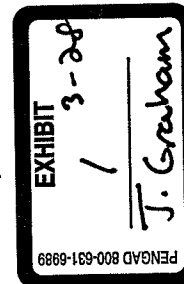
FAX NO: 601-987-5353

FROM: Frances Wright

RE: Graham

DATE: 3/27/14

NUMBER OF PAGES 4  
(Including Cover Sheet)



### MESSAGE:

I apologize for the delay - Deborah Warren, our  
Victim Advocate, has asked that I forward this  
information to you - Thank You - Frances Wright

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03-27-'14 13:48 FROM- JCDA

6014283191

T-823 P0002/0004 F-995



ANTHONY J. BUCKLEY

District Attorney

Fifteenth Circuit Court District

DENNIS L. BISNETTE  
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ASSISTANT DISTRICT ATTORNEYP.O. BOX 313  
LAUREL, MS 39441TELEPHONE (601) 649-4606  
FAX (601) 428-3191

April 7, 2010

Investigator Don Sumrall  
Jones County Sheriff's Dept.  
P.O. Box 185  
Laurel, MS 39441Re: *Albert Lee Graham*  
*#2009-256-2*  
*Aggravated Assault*

Dear Don:

Please be advised that I am declining the above referenced matter against Albert Lee Graham at this time on the grounds the defendant is deceased.

Please mark your files and records appropriately.

Sincerely,

Dennis L. Bisnette  
Assistant District Attorney

dlb /skh

cc: Faye Norton Brent  
Capt. Stacy Walls

JONES COUNTY MISSISSIPPI

JC 000868



03-27-'14 13:49 FROM- JCDA

6014283191

T-823 P0003/0004 F-995

**JONES COUNTY SHERIFF'S OFFICE****VOLUNTARY STATEMENT**

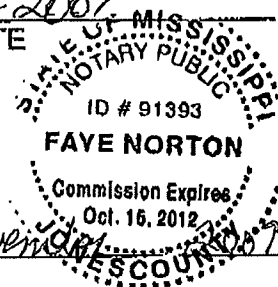
THIS STATEMENT WAS TAKEN AT THE JONES COUNTY SHERIFF'S OFFICE  
ON NOVEMBER 12, 2009 AT 10:18 A.M. FROM THE FOLLOWING INDIVIDUAL:

NAME: Jeanetter Graham  
ADDRESS: 2469 Bush Dairy Rd., Laurel, MS 39443  
PHONE #: [REDACTED]  
DOB: [REDACTED]  
SS#: [REDACTED]

Last Tuesday morning, about 8:45 my husband, Albert Graham, had used the car to go to the store to get more beer, cigarettes and stuff. After he came back with the car, I was getting ready to go to work. I had fixed his mamma's breakfast and fed her. He ask to use the car again and I said no I gotta go to work and I have a doctor's appointment. He said F..... you cuz, I'll get to where I need to go and I am through with you. I said, thank you Jesus, praise the Lord, I was saying these things sarcastically. I also said Glory to God. He was standing by the driveway, the second driveway. That's the way I was going out. I was going fast but I was not trying to hit him. He got up by the hedges, the azalea bushes I think they are, as I was getting ready to pass him; he shot me. I stopped the car, I was bleeding. I felt the burning sensation in my chest and blood was pumping everywhere. He came up to the car after he shot me and I said you shot me. I got my lab jacket and started pressing to apply pressure. I knew to do that from my training. I said Albert you shot me, why did you shoot me. You know I wouldn't hurt you. He said I didn't know what to believe, I thought you were going to run over me. I said Albert why did you have to shoot me. You could have shot the car or the wheels, why did you shoot me. He got in the car and I asked him to take me to the hospital. I was bleeding to death. I was praying dear God, forgive me for my sins, prepare me a place in heaven if that's your will. Please see about my children and grandchildren. I said Lord, forgive Albert for what he has done to me for no reason. Albert drove me straight to the hospital. He said I know they are going to arrest me but I don't care. I'm gonna tell them you was trying to run over me. He is a killer. He choked me once before until I almost passed out. I believe it was this year and I contacted the Sheriff's Department. There have been numerous occasions I have called the Sheriff's Department. He told Helen Darby Wilson last Monday night that he was going to kill that bitch, meaning me. End of statement.

Jeanetter Graham  
NAME

11-12-2009  
DATE



Don A. Lumsden  
WITNESS

Sworn to and subscribed before me this the 12<sup>th</sup> day of November, 2009.

Faye Norton  
NOTARY

My Commission Expires: Oct. 16, 2012

# JONES COUNTY SHERIFF'S OFFICE

## VOLUNTARY STATEMENT

THIS STATEMENT WAS TAKEN AT THE JONES COUNTY SHERIFF'S OFFICE  
ON NOVEMBER 16, 2009 AT 9:31 A.M. FROM THE FOLLOWING INDIVIDUAL:

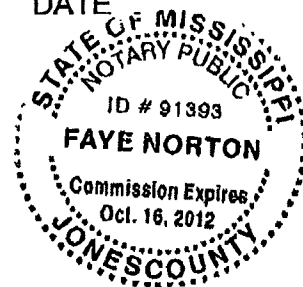
NAME: HELEN WILSON  
ADDRESS: 305 UNION LINE RD., LAUREL, MS 39443  
PHONE #: [REDACTED]  
DOB: [REDACTED]  
SS#: [REDACTED]

Last Wednesday night, I was at Short Stop in Soso putting gas in my truck and Albert Lee Graham pulled up with someone and got out of the truck and ask me if I would drop him off at home. He said he would put gas in my truck for me. I told him yes I will. We left Short Stop and he wanted to go by the Shady Oak School to some man's house. The man's car was not there and we did not stop. I went by my cousin's house on Shady School Rd where everybody was going to play cards and dominoes. We stayed there about 10 minutes. Just before we left, we were sitting in the vehicle and I said I really don't have to take you home, there's your wife. She was parked behind me. He got out of the car to go ask her if she would drop him off at home. She kept pulling off and he kept walking toward her. He was saying, hold up, let me get in the car with you. I heard her say, no Albert Lee, you had my car all day long. Albert got back in my truck and said come on please take me home. He said, as we drove down the road, I'm tired of her taking my kindness for weakness. I'm gonna kill that bitch. He never said anything else until I got him home and he said thank you cuz. He got out of my truck and that's the last time I saw him. End of statement.

Helen Wilson  
NAME

11-16-09  
DATE

Don A. Lawrence  
WITNESS



Sworn to and subscribed before me this the 16<sup>th</sup> day of November, 2009.

Faye Norton  
NOTARY

My Commission Expires: Oct. 16, 2012